

From: [Moore, Gary](#)
To: [Crawford, Beth](#)
Cc: [Cassidey, LeRoy](#)
Subject: Re: CES Status
Date: Friday, November 14, 2014 1:30:56 PM
Attachments: [NTank2\(OT2\).jpeg](#)

Beth:

As we discussed, OT2 is basically oil and water (15%/85%). As you mention the results show 43,100 ppm TSS. This would only be 4.3% solids. This can easily be put into a vacuum truck so no need for a vac box. In fact see the reference sample attached. In fact, I am kind of surprised this can't be taken by Lonestar. Oh well, I want to get it off-site so if we have a place to go with it that is reasonable that is fine.

I noticed that STank5 was not included on the list. It has been difficult to determine the floating sludge layer thickness but it does have some water in it as well. We will likely have to evaluate this one further.

Thanks

Gary Moore

Federal On-Scene Coordinator

U.S. EPA Region 6

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From: Crawford, Beth
Sent: Friday, November 14, 2014 11:18 AM
To: Moore, Gary
Cc: Cassidey, LeRoy
Subject: RE: CES Status

Beth:

South Containment: Did you say it needs to go in a vacuum truck rather than a vacuum box? Not sure that is possible but Frank and Leroy need to make that evaluation. I am working on scheduling one load for Wednesday of next week and one for Friday via a Vac Truck. Adam and LeRoy look at South Containment Adam feels it can go in a vac truck. I will move forward with shipping papers as well.

Roll-Off Boxes:

1. Spill Cleanup/PPE/ABS Hose (Full Box): This has been profile into US Ecology. When is it being shipped and have we worked out the logistics (CES to US Ecology to dump, Box goes to Cleaning Facility, Dynamic Picks up from cleaning facility to yard or back to CES?) I am still waiting on the final approval for this stream. Once this is approved we can ship quickly. These roll-offs have liners correct? Do we really think the box will need to go to a cleaning facility?
2. Soil/Oil from South Pond (Full): This has not been sampled so we need a sampling plan to implement. Did you get my email on my suggestions for analytical on this stream?
3. VB620 Sludge/Floor Scrapings from Around Site (Not Full): In talking with LeRoy it sounded like we were treating #'s 2 and 3 as the same stream if that's not the case let me know and I may have to wait until I see everything that has gone in the box to be able to give you an exact answer on analysis.
4. Leroy are there any other boxes In talking to LeRoy it was my understanding no, there are not any other boxes.

Vacuum Boxes:

1. We need to get everything transferred shipped out to the appropriate facility; I have asked Veolia to get all five vac boxes picked up on or before 11/24. I will know exact dates early next week.

2. VB607 and VB641: Need to get everything worked out with Republic and get these sent out. Question: VB607 - Is it being transferred into vacuum truck or vacuum box to be sent In talking with LeRoy it was my understanding that VB607 would be shipped in a vac truck.

Question: VB641 - Can we ship this material in the original container and bury the whole box? Is the box shippable? Leroy and Frank need to evaluate but it is the best box. I have submitted the profile for the box and its contents to be buried as a unit. Republic is scheduled to come out to the site on Monday and let us know if they are willing to transport the box in its current condition.

Outside ASTs: Let's start getting the easy stuff scheduled and gone. Our Class 1 profile into Republic has been approved into Blue Ridge Landfill. This means we can ship via a Vac trucks OT6, WMU123 and Stank 5. OT-2 has significant solids therefore we should ship this material in a vac boxes. I am scheduling OT3 and OT6 to start shipping on Thursday 11/20.

Do we have an update on FT1004 and FT506 as to when we will see the second set of testing?



Beth Crawford

Scientist

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From: Moore, Gary [mailto:Moore.Gary@epa.gov]

Sent: Thursday, November 13, 2014 9:32 AM

To: Crawford, Beth

Cc: Cassidey, LeRoy

Subject: Re: CES Status

Beth:

South Containment: Did you say it needs to go in a vacuum truck rather than a vacuum box? Not sure that is possible but Frank and Leroy need to make that evaluation.

Roll-Off Boxes:

1. Spill Cleanup/PPE/ABS Hose (Full Box): This has been profile into US Ecology. When is it being shipped and have we worked out the logistics (CES to US Ecology to dump, Box goes to Cleaning Facility, Dynamic Picks up from cleaning facility to yard or back to CES?)

2. Soil/Oil from South Pond (Full): This has not been sampled so we need a sampling plan to implement.

3. VB620 Sludge/Floor Scrapings from Around Site (Not Full):

4. Leroy are there any other boxes

Vacuum Boxes:

1. We need to get everything transferred shipped out to the appropriate facility;

2. VB607 and VB641: Need to get everything worked out with Republic and get these sent out.

Question: VB607 - Is it being transferred into vacuum truck or vacuum box to be sent

Question: VB641 - Can we ship this material in the original container and bury the whole box? Is the box shippable? Leroy and Frank need to evaluate but it is the best box.

Outside ASTs: Lets start getting the easy stuff scheduled and gone.

WWT Tanks: This can come later

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From: Crawford, Beth <beth.crawford@CBIFederalServices.com>

Sent: Thursday, November 13, 2014 7:30 AM

To: Moore, Gary

Cc: Cassidey, LeRoy

Subject: CES Status

Gary,

Good morning, Here is an update as to where we stand with Veolia and the processing of the vac boxes:

Manifest	Date	Box # (original / shipped)	Weight (manifest / received)	Sulfur (content / surcharge per LB)	Sodium (content / surcharge per LB)	Mercury	CES approval
000832676VES	10/23	VB25141/ VB25333	38,000/ 19,720	19.2%/ \$0.12	1.2%/ \$0.035	Within Parameters	10/29 email
000832683VES	10/29	VB251842/ VB25315	30,000/ 21,460	51%/ \$.030	1.07%/ \$0.035	Within Parameters	10/30 email
000832682VES	11/5	VB640& VB610/ VB25287	28,000/ 26,800	30.0%/ \$0.18	1.21%/ \$0.035	Within Parameters	11/5 email
000832680VES	11/7	VB610, VB618, VB640/VB25206	28,000/				
000832681VES	11/7	VB618/ VB25251	28,000/				
Pending pick-up		VB639/ VB25274					
Pending pick-up		VB639/ VB25341					
Pending pick-up		VB633/ VB25229					
Pending pick-up		VB633/ VB25242					

Veolia has confirmed that none of the loads received today have been completely processed yet. Due to the high sulfur content of the material it is going to take a bit to process, this we knew was a possibility at the beginning of the project. Veolia is supposed to be updating me later today with estimated completion dates for each box. They are also supposed to be getting with me on a pick-up dates for the 4 boxes we currently have onsite.

On another matter after I confirmed with Demita that Lonestar wanted the South Containment in a Vac Box she called back to say it has to be a **VAC TRUCK**. I will move forward with getting the manifest ready for review. Demita is also working on the non-hazardous water tank approvals. I will get an update on that today. On a side note I do have EQ out of Belleville, MI looking at data from the North and South Tank

Farms to see if there is any way possible they can treat these organics via chemical oxidation. The naphthalene is a concern for them but they have asked for samples for treat study purposes. To be honest I'm not holding much hope but it doesn't cost us any money to explore the possibility.

I also need to tell you what type of analysis we need to run on the roll-off which contains floor scrapings. It is my understanding the roll-off contains sludge from Vac Box 620 which was non-hazardous as well as scrapings from the pond areas where the water was removed and placed into the sanitary sewer. If you are ok with using generator knowledge to confirm lead less than 1.5 ppm I will say we can leave off TCLP metals and simply run the following: TCLP VOC, TCLP SVOC, TPH, TCL VOC and TCL SVOC. It could be our TPH results throw us into a Class 1 status assuming this material is non-hazardous. I don't see the need for PCB or pesticide analysis however I want you to be comfortable with signing off on that. Let me know if we need to discuss further.

Leroy has confirmed no free liquids in Vac Box 641. So I will adjust the Republic profile accordingly and we'll get that moving. I did receive your email about shipping as much as possible by 11/24. Please let me know if I have missed any action items otherwise I'll be in touch later today with updated information.

Thanks,



Beth Crawford

Scientist

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